

EXHIBIT 4

CONFIDENTIAL

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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In re ANADARKO PETROLEUM Civil Action No.
CORPORATION SECURITIES 4:20-cv-00576
LITIGATION

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REMOTE VIDEOTAPED DEPOSITION BY VIRTUAL ZOOM OF
J. RICHARD DIETRICH
Saturday, March 11, 2023


Reported By: Lynne Ledanois, CSR 6811
Job No. 5780790

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<p>1 carried out in accordance with PCAOB professional 11:45AM 2 audit standards? 3 A I didn't independently verify that, no. 4 (Reporter clarification.) 5 BY MR. DROSMAN: 11:45AM 6 Q Did KPMG forensic specialists assist KPMG 7 auditors in procedures relating to the company's 8 investigation of a whistleblower allegation or 9 allegations during the years 2014 through 2017? 10 A I'm aware that there was an investigation. 11:46AM 11 My understanding is the investigation was instituted 12 by, I believe, the audit committee of Anadarko or its 13 board of directors. 14 And that there was subsequently SEC 15 investigation, KPMG would certainly have been 11:46AM 16 involved with that. 17 I don't recall specifically today which 18 specific individuals are the classification of 19 employees or partners at KPMG that were involved. 20 But my perception from my reading of the 11:46AM 21 materials associated with that investigation was 22 that it was a fairly substantial investigation that 23 likely would have involved forensic people or other 24 specialists inside KPMG. 25 Q Did you understand that accounting for 11:47AM Page 106</p>	<p>1 documents related to the investigation. 11:49AM 2 What I asked you was: In assessing the 3 accounting for Shen 3, did you review KPMG forensic 4 work papers or work product regarding the company's 5 investigation into the accounting for Shen 3? 11:49AM 6 A Again, I may have, I don't recall 7 specifically. 8 Q I take it you would want to review that 9 information; correct? 10 A Not necessarily, no. 11:49AM 11 Q Why not? 12 A Well, it would be interesting for me to see 13 what another professional's view was, but that would 14 be a factor that I would consider in my own analysis 15 if I had access to it and read it. 11:49AM 16 But at the same time, it wouldn't be 17 dispositive for me to read what they said. 18 What I can help you to understand is that 19 different accounting professionals, even experts can 20 have different views. 11:50AM 21 Q Right. You would take into account KPMG 22 forensic examiners' work papers and work product in 23 your analysis, wouldn't you want to review the 24 information from KPMG forensic examiners regarding 25 the company's investigation into the accounting for 11:50AM Page 108</p>
<p>1 Shen 3 was part of this investigation that you just 11:47AM 2 described? 3 A Yes. 4 Q Do you know one way or the other whether 5 KPMG forensic specialists assisted KPMG auditors in 11:47AM 6 procedures relating to the company's investigation 7 of a whistleblower allegation? 8 A I don't recall specifically, no. 9 Q Did KPMG forensic specialists assist KPMG 10 auditors in procedures relating to the company's 11:47AM 11 investigation of whether Shen 3 was improperly 12 accounted for? 13 A I don't recall today the specifics of the 14 investigation, so I don't recall that, no. 15 Q In assessing the accounting for Shen 3, 11:48AM 16 did you review KPMG forensic work papers and work 17 product regarding the company's investigation into 18 the accounting for Shen 3? 19 A I read documents related to that. My 20 specific recollection is that one of the documents 11:48AM 21 that I read that was fairly lengthy included some 22 redacted materials as well as other materials related 23 to the investigation that appear to me to be 24 substantial investigation and clear results. 25 Q I did not ask you whether you reviewed any 11:49AM Page 107</p>	<p>1 Shen 3? 11:50AM 2 A Again, I might do that and I might not do 3 that. 4 Q Well, that would be relevant to your 5 investigation; right? 11:51AM 6 A It might be informative but it might not be 7 relevant. 8 Q You don't know one way or the other 9 because you did not review that information; 10 correct? 11:51AM 11 A I know that based on what I reviewed, I 12 believed I had a basis for understanding KPMG's view 13 of Anadarko's accounting for its oil exploration 14 activities. 15 Q You understand that as part of its audit 11:51AM 16 evidence, KPMG asked for and received various 17 representations from management? 18 A Yes. 19 Q That included details surrounding Shen 3; 20 correct? 11:51AM 21 A Again, I don't recall specifically, but I 22 would anticipate that it would have, yes. 23 Q Were any of the people who provided 24 representations to KPMG non-accountants? 25 A I don't recall, but I would expect they 11:52AM Page 109</p>

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<p>1 Q Is it original language that -- 5:06PM</p> <p>2 A I've already cited to you several places</p> <p>3 where the language must be original because the</p> <p>4 construction does not include information that could</p> <p>5 have been prepared prior to the existence of the 5:06PM</p> <p>6 codification.</p> <p>7 Q I'm asking you if there are any other</p> <p>8 sources identified by the FASB for 932-360-35-16?</p> <p>9 A And I'm telling you they don't cite sources</p> <p>10 when they create the material themselves. 5:06PM</p> <p>11 Q I didn't ask that question.</p> <p>12 I asked you whether the FASB identified</p> <p>13 any other sources besides FAS 19 for 932-360-35-16?</p> <p>14 Can you answer that question?</p> <p>15 MS. PHILLIPS: Asked and answered. 5:07PM</p> <p>16 THE WITNESS: Yes, they do not cite</p> <p>17 anything else.</p> <p>18 BY MR. DROSMAN:</p> <p>19 Q Let's look at 932-360-35-18.</p> <p>20 A Okay. 5:07PM</p> <p>21 Q Does the FASB identify any sources other</p> <p>22 than FAS 19 as the source for the information in</p> <p>23 that provision?</p> <p>24 A I don't see anything else. But again, I</p> <p>25 wouldn't see anything else if it was created by the 5:07PM</p> <p style="text-align: right;">Page 282</p>	<p>1 I, LYNNE M. LEDANOIS, a Certified</p> <p>2 Shorthand Reporter of the State of California, do</p> <p>3 hereby certify:</p> <p>4 That the foregoing proceedings were taken</p> <p>5 before me at the time and place herein set forth;</p> <p>6 that any witnesses in the foregoing proceedings,</p> <p>7 prior to testifying, were duly sworn; that a record</p> <p>8 of the proceedings was made by me using machine</p> <p>9 shorthand which was thereafter transcribed under my</p> <p>10 direction; that the foregoing transcript is a true</p> <p>11 record of the testimony given.</p> <p>12 Further, that if the foregoing pertains to</p> <p>13 the original transcript of a deposition in a Federal</p> <p>14 Case, before completion of the proceedings, review</p> <p>15 of the transcript [] was [x] was not requested.</p> <p>16 I further certify I am neither financially</p> <p>17 interested in the action nor a relative or employee</p> <p>18 of any attorney or party to this action.</p> <p>19 IN WITNESS WHEREOF, I have this date</p> <p>20 subscribed my name.</p> <p>21</p> <p>22 Dated: March 13, 2023</p> <p>23</p> <p>24  LYNNE MARIE LEDANOIS CSR No. 6811</p> <p style="text-align: right;">Page 284</p>
<p>1 FASB at the adoption of the codification. 5:07PM</p> <p>2 MR. DROSMAN: Move to strike everything</p> <p>3 after "I don't see anything else" as nonresponsive.</p> <p>4 I'm going to go ahead and conclude the</p> <p>5 deposition for today. 5:08PM</p> <p>6 MS. PHILLIPS: Can we go off the record?</p> <p>7 MR. DROSMAN: Sure.</p> <p>8 THE VIDEOGRAPHER: We're going off the</p> <p>9 record at 5:08 p.m.</p> <p>10 (Recess taken.) 5:08PM</p> <p>11 VIDEOGRAPHER: We're on the record at</p> <p>12 5:28 p.m. This is the beginning of Media 7 in the</p> <p>13 deposition of Dr. Richard Dietrich.</p> <p>14 MS. PHILLIPS: Thanks very much.</p> <p>15 Defendants don't have any further questions. 5:28PM</p> <p>16 Thanks, Dr. Dietrich.</p> <p>17 MR. DROSMAN: Thanks.</p> <p>18 THE VIDEOGRAPHER: We're going off the</p> <p>19 record at 5:28 and this concludes today's testimony</p> <p>20 given by Dr. Richard Dietrich. 5:28PM</p> <p>21 The total number of media units used was</p> <p>22 seven and will be retained by Veritext.</p> <p>23 (Proceedings concluded at 5:28 p.m.)</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 283</p>	<p>1 DANIEL DROSMAN, ESQ.</p> <p>2 ddrosman@rgdlaw.com</p> <p>3 March 13, 2023</p> <p>4 IN RE ANADARKO PETROLEUM CORPORATION SECURITIES LITIGATION</p> <p>5 MARCH 11, 2023, J. RICHARD DIETRICH, JOB NO. 5780790</p> <p>6 The above-referenced transcript has been</p> <p>7 completed by Veritext Legal Solutions and</p> <p>8 review of the transcript is being handled as follows:</p> <p>9 <input type="checkbox"/> Per CA State Code (CCP 2025.520 (a)-(e)) - Contact Veritext</p> <p>10 to schedule a time to review the original transcript at</p> <p>11 a Veritext office.</p> <p>12 <input type="checkbox"/> Per CA State Code (CCP 2025.520 (a)-(e)) - Locked .PDF</p> <p>13 Transcript - The witness should review the transcript and</p> <p>14 make any necessary corrections on the errata pages included</p> <p>15 below, notating the page and line number of the corrections.</p> <p>16 The witness should then sign and date the errata and penalty</p> <p>17 of perjury pages and return the completed pages to all</p> <p>18 appearing counsel within the period of time determined at</p> <p>19 the deposition or provided by the Code of Civil Procedure.</p> <p>20 <input type="checkbox"/> Waiving the CA Code of Civil Procedure per Stipulation of</p> <p>21 Counsel - Original transcript to be released for signature</p> <p>22 as determined at the deposition.</p> <p>23 <input type="checkbox"/> Signature Waived - Reading & Signature was waived at the</p> <p>24 time of the deposition.</p> <p>25</p> <p style="text-align: right;">Page 285</p>